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Attorneys for Cross Defendant/Cross and Counter Claimant, Bibiji Inderjit Kaur Puri

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

GOLDEN TEMPLE OF OREGON, LLC, an)
Oregon Limited Liability Company,)

Plaintiff,)

v.)

WAI LANA PRODUCTIONS, LLC,)
a California limited liability company,)

Defendant,)

AND RELATED CROSS ACTIONS)

Case No. 3:09-CV-902-HZ

**BIBIJI INDERJIT KAUR PURI'S
MOTION FOR SUMMARY
JUDGMENT AGAINST WAI LANA
PRODUCTIONS, LLC**

ORAL ARGUMENT REQUESTED

RULE 7-1(a) CERTIFICATION OF COMPLIANCE

Pursuant to Local Rule 7-1(a), counsel for Cross Defendant/Cross and Counter Claimant, Bibiji Inderjit Kaur Puri (“Bibiji”) hereby certifies that she conferred in good faith with counsel for defendant Wai Lana Productions, LLC (“Wai Lana”) to resolve the issues raised in this Motion For Summary Judgment as to Wai Lana’s Second Counterclaim for Cancellation and that the parties have been unable to reach an agreement.

MOTION

Pursuant to Fed. R. Civ. P. 56, Bibiji moves this Court for Judgment in favor of Bibiji and against Wai Lana as to Wai Lana’s Second Counterclaim for Cancellation of U.S. Trademark Registration Nos. 1,980,514; 3,435,101, and 3,607,292.

This Motion for Summary Judgment is made on the grounds that there are no triable issues of material fact and that Bibiji is entitled to judgment as a matter of law.

This Motion for Summary Judgment is supported by the Memorandum of Law and the Declaration of Surjit P. Soni submitted concurrently herewith.

DATED this 5th day of December, 2011.

/s/ Surjit P. Soni
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18, and not a party to the within action; my business address is 35 North Lake Avenue, Suite 720, Pasadena, California 91101.

On December 5, 2011, I served the foregoing document described as **BIBIJI INDERJIT KAUR PURI'S MOTION FOR SUMMARY JUDGMENT AGAINST WAI LANA PRODUCTIONS, LLC** on the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope addressed as follows:

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☐ (BY MAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. postal service on that same day, with postage thereon fully prepaid at Pasadena, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ (PERSONAL SERVICE) I personally served by hand the above referenced document on the addressees listed above.

☒ (VIA ELECTRONIC MAIL) I caused such document to be delivered to addressees listed above.

☐ (FACSIMILE) I caused the attached document to be transmitted to: the above addressees

I declare that I am a member of the bar of this Court.

Executed on December 5, 2011, at Pasadena, California.

/s/ Gayane Mkrttchian
Gayane Mkrttchian